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October 5, 2023

BY ECF

Hon. Kenneth M. Karas United States District Judge Southern District of New York 300 Quarropas Street White Plains, NY 10601

Re: United States v. Rafael Ventura Paula

23 Cr. 452 (KMK

Dear Judge Karas:

I am the attorney for Rafael Ventura Paula, the defendant in the above-referenced matter, appointed pursuant to the Criminal Justice Act. I write requesting that the Court appoint an associate, Alex Huot, to assist me in this case, including reviewing discovery, preparing motions and preparing for and assisting in any trial of this defendant. Mr. Huot recently assisted me in preparing for and conducting trials before Judges Nelson Roman and Cathy Seibel. He has also assisted Attorney Bobbi Sternheim and other CJA attorneys for many years since graduating from law school in 2012.

I am seeking authorization for Mr. Huot to work up to 200 hours on this matter. If approved, Mr. Huot will work under my direction. Efforts will obviously be undertaken to not duplicate any efforts although I believe if there is a trial in this case it is important and necessary for me to adequately conduct the trial for Mr. Huot to appear with me at the trial. At the conclusion of this case, he will submit a voucher subject to Court approval. I am asking that Mr. Huot be approved at a rate of \$125/hour, which according to Alan Nelson, the Circuit Case Budgeting Attorney, is a rate typical for associates with more than 8 years of experience.

If the foregoing meets with the Court's approval, then I respectfully request that Your Honor "So Order" this letter.

Thank you for your consideration in this matter.

JO CIGOICO

10/5/23

Respectfully submitted,

Kerry A. Lawrence

cc: All counsel (via ecf)